

Tarryn Harris
August 11, 2023

1

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF INDIANA

CIVIL ACTION NO. 1:22-cv-01828-SEB-MG

JOHN DOE,)
)
Plaintiff,)
)
V.)
)
BUTLER UNIVERSITY,)
)
Defendant.)

Deposition by Zoom of TARRYN HARRIS, a
witness who appeared remotely before me,
Valerie Fillenwarth, RPR, a Notary Public in
and for the County of Johnson, State of
Indiana, taken on behalf of the Plaintiff, with
all parties appearing via Zoom, taken on
August 11, 2023, commencing at 2:30 p.m.,
pursuant to all applicable rules, with Notice
as to the time and place thereof.

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30	<p>1 A. During this case or during the Title IX case</p> <p>2 that happened our sophomore year?</p> <p>3 Q. Sure. During the Title IX case.</p> <p>4 A. I did not understand that I was personally a</p> <p>5 witness. Like I've never seen that list before</p> <p>6 that you've given me. I understand that I was</p> <p>7 called to report on the incidences that had</p> <p>8 happened when I was an RA, during the time that</p> <p>9 I was an RA, but I only, like I said, received</p> <p>10 one phone call and then there was never any</p> <p>11 follow-up after that.</p> <p>12 Q. Okay. And you mentioned earlier that there was</p> <p>13 a big group meeting that occurred with</p> <p>14 respondent and others, is that correct?</p> <p>15 A. Yes.</p> <p>16 Q. Do you recall when that meeting occurred?</p> <p>17 A. In terms of a specific date, I don't remember a</p> <p>18 specific date.</p> <p>19 Q. Okay. Do you remember approximately when it</p> <p>20 occurred?</p> <p>21 A. It probably was late February or early March.</p> <p>22 It was early into when -- early into the</p> <p>23 semester.</p> <p>24 Q. Okay. And that was the, just to be clear, the</p> <p>25 spring semester of 2021, is that correct?</p>	32	<p>1 specifically --</p> <p>2 Q. Okay.</p> <p>3 A. -- because I was unfamiliar with them.</p> <p>4 Q. Thank you. And your Witness 9 and then the</p> <p>5 other RA that you referred to as Witness 10, is</p> <p>6 that correct?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. I'm going to stop sharing for the</p> <p>9 moment.</p> <p>10 Did you have any conversations prior to</p> <p>11 that mediation?</p> <p>12 A. About the conflict?</p> <p>13 Q. Yes, besides the one that you just referred to</p> <p>14 with Witness 10 where he asked you to join him?</p> <p>15 A. No. I hadn't heard of the issue.</p> <p>16 Q. Okay. And did you review any documents about</p> <p>17 it before you went in to this mediation?</p> <p>18 A. No. Witness 10 kind of explained what was</p> <p>19 happening, but most of the information I</p> <p>20 received was the accounts given by the other</p> <p>21 people that were involved in the mediation.</p> <p>22 Q. And those accounts were given at the mediation,</p> <p>23 is that right?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. So why don't you -- strike.</p>
31	<p>1 A. Yes.</p> <p>2 Q. Okay. And what do you recall about why you</p> <p>3 became involved in that meeting?</p> <p>4 A. I recall that I received a message from</p> <p>5 Witness 10, the other resident assistant, via</p> <p>6 GroupMe. He asked me if I wanted to take part</p> <p>7 in a mediation because I was a relatively new</p> <p>8 RA at the time and the conflict involved two of</p> <p>9 my residents. As I understood it, it was more</p> <p>10 as an observing capacity and as a support for</p> <p>11 my own residents, but the people that had asked</p> <p>12 him to conduct the mediation were his</p> <p>13 residents, so he made it pretty clear that he</p> <p>14 wanted to take the reins.</p> <p>15 Q. Okay. And do you recall who attended the</p> <p>16 mediation besides you and Witness 10, presuming</p> <p>17 that he did take the reins and do that?</p> <p>18 A. I can't remember specific names. I know that</p> <p>19 both the -- sorry, I can't remember the</p> <p>20 specific identifiers -- complainant, I think,</p> <p>21 and respondent were both there and -- I know</p> <p>22 that Witness 2 was there and Witness 3 was</p> <p>23 there. Those are people that I remember</p> <p>24 specifically. But the other names, I don't</p> <p>25 remember being there, or couldn't tell you</p>	33	<p>1 I want to talk about the mediation at</p> <p>2 this point. So you understood that it was a</p> <p>3 mediation, that's right?</p> <p>4 A. Yes.</p> <p>5 Q. And what do you recall about that mediation?</p> <p>6 A. I recall that it was in the business building.</p> <p>7 We were very limited in where we could meet</p> <p>8 during COVID, especially given the size of</p> <p>9 group. So it was in the business building on</p> <p>10 one of the floors kind of in a lounge area. I</p> <p>11 remember it was a fairly large group. And I</p> <p>12 hadn't previously met any of the other students</p> <p>13 that weren't my residents.</p> <p>14 Q. When you say "previous" -- strike.</p> <p>15 And when you say "large group," do you</p> <p>16 mean more than ten students?</p> <p>17 A. I don't remember the specific number.</p> <p>18 Q. Do you remember if it was more than five?</p> <p>19 A. I would say so, yes.</p> <p>20 Q. Okay. Do you recall how long the meeting</p> <p>21 lasted?</p> <p>22 A. Not specifically, but I would say around 30</p> <p>23 minutes.</p> <p>24 Q. I'm sorry, you cut out. How long did you say?</p> <p>25 A. I said that I can't remember specifically, but</p>

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34	<p>1 I would say it was around 30 minutes.</p> <p>2 THE COURT REPORTER: 30 minutes?</p> <p>3 THE WITNESS: Yes, 30 minutes.</p> <p>4 THE COURT REPORTER: Thank you.</p> <p>5 MS. FEDERICO: Thank you, Valerie.</p> <p>6 BY MS. FEDERICO:</p> <p>7 Q. So do you recall, and I can share the key one</p> <p>8 more time, but do you recall who exactly shared</p> <p>9 their account of the respondent's behavior at</p> <p>10 the mediation from this list?</p> <p>11 A. I remember the complainant spoke, Witness 3</p> <p>12 spoke, and those are the two that I remember</p> <p>13 specifically, but I know that other people did</p> <p>14 speak as well, I just don't recall their names.</p> <p>15 Q. Okay. And how would you say -- strike.</p> <p>16 What did the complainant say during the</p> <p>17 meeting?</p> <p>18 A. I don't remember specific language. I just</p> <p>19 remember, in general, there was a consensus</p> <p>20 between the complainant and several of the</p> <p>21 other students that there had been certain</p> <p>22 boundaries set by the friend group that they</p> <p>23 were a part of, that they felt that the</p> <p>24 respondent was not adhering to.</p> <p>25 Q. Okay. And what were those boundaries?</p>	36	<p>1 Q. And what do you recall about the respondent</p> <p>2 during this meeting?</p> <p>3 A. I know that he was very upset. At one point he</p> <p>4 did cry. But mostly apologetic.</p> <p>5 Q. What did the respondent say during the meeting,</p> <p>6 to the best of your recollection?</p> <p>7 A. I know that there were a lot of comments made</p> <p>8 about feeling as though their -- like the</p> <p>9 complaints of the other people in the meeting</p> <p>10 weren't shared as freely as the respondent had</p> <p>11 hoped; that a lot of his understanding of the</p> <p>12 situation was that they were asking him to pick</p> <p>13 up on social cues and that that was something</p> <p>14 that was hard for him; I remember him saying</p> <p>15 that.</p> <p>16 Q. And would you characterize him as being upset</p> <p>17 during the meeting?</p> <p>18 A. Yes.</p> <p>19 Q. And did you speak with him after the meeting in</p> <p>20 any capacity, one on one? And I should</p> <p>21 clarify, when I say "after the meeting," I mean</p> <p>22 directly after, like that day.</p> <p>23 A. Yes. I stayed with him after people had left</p> <p>24 and we walked out together.</p> <p>25 Q. And what do you recall about the time where you</p>
35	<p>1 A. From my understanding, there had been a</p> <p>2 conversation, before I was an RA, about the</p> <p>3 respondent coming into their room and spending</p> <p>4 a lot of time there. And that was kind of the</p> <p>5 crux of the argument, that he was spending too</p> <p>6 much time in their room, and that was it.</p> <p>7 Q. And do you recall the mood of the complainant</p> <p>8 during the mediation?</p> <p>9 A. I would say it was just kind of like fed up,</p> <p>10 kind of an annoyance, an exhaustion, I guess.</p> <p>11 Q. Okay. And you said that Witness 3 also shared</p> <p>12 her thoughts during this mediation as well?</p> <p>13 A. Yes.</p> <p>14 Q. And what do you recall about what Witness 3</p> <p>15 shared?</p> <p>16 A. It mostly seemed to be in support of the</p> <p>17 complainant and other people that had spoken,</p> <p>18 just kind of reiterating their thoughts.</p> <p>19 Q. Did Witness 3 also speak about boundaries?</p> <p>20 A. Not that I remember specifically.</p> <p>21 Q. Okay. And what was re- -- strike.</p> <p>22 What was the mood of Witness 3 during the</p> <p>23 meeting?</p> <p>24 A. I think just supportive of the other people</p> <p>25 involved in the meeting.</p>	37	<p>1 stayed with him and then you walked out</p> <p>2 together?</p> <p>3 A. I remember that he was upset.</p> <p>4 Q. And did he share anything with you?</p> <p>5 A. Not that I specifically remember. He was</p> <p>6 mostly just upset and was shedding tears.</p> <p>7 Q. Do you recall anything else about the mediation</p> <p>8 that we haven't discussed that you want to</p> <p>9 share with me now?</p> <p>10 A. No.</p> <p>11 Q. You mentioned earlier that the respondent came</p> <p>12 to your room several times to talk about</p> <p>13 things. Can you tell me a little bit about</p> <p>14 those conversations that you had with the</p> <p>15 respondent?</p> <p>16 A. Yes. So I believe the respondent came to my</p> <p>17 room two additional times during this process,</p> <p>18 and both times it was mostly in capacity of I</p> <p>19 guess trying to gain more information of the</p> <p>20 situation. I felt as if he was looking for</p> <p>21 support. I know a lot of the time, kind of</p> <p>22 just asking in general about how other people</p> <p>23 that were involved in the mediation were</p> <p>24 feeling, which I couldn't tell him, and</p> <p>25 couldn't like divulge that information to him.</p>

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<p style="text-align: right;">38</p> <p>1 It mostly seemed as if he was kind of looking 2 for validation in terms of like how the 3 original mediation had went and kind of the 4 aftermath. 5 Q. Did he ever express that he was very upset 6 during these other conversations with you? 7 A. Yes. 8 Q. Did he ever express that he felt ostracized in 9 any way to you? 10 A. He expressed that he felt like the friend group 11 was against him, yes. 12 Q. Did he ever express that he felt like an 13 outsider at any time? 14 A. Other than expressing that he felt like the 15 friend group was kind of, again, wanting to 16 step away from him, that was like the only 17 language that he used. 18 Q. Okay. And did he ever express to you why he 19 thought they were trying to separate from him? 20 A. Other than the original complaints about 21 boundaries, no. 22 Q. Do you have any other perceptions about why 23 that friend group wanted to separate from John 24 Doe? 25 MS. ROBERTS: Objection as to form and</p>	<p style="text-align: right;">40</p> <p>1 2021"? 2 A. Yes. 3 Q. Okay. And to be clear, you understood yourself 4 to be Witness 9 in this investigation? 5 A. Yes. 6 Q. Okay. Do you recall discussing with Kody 7 Rother the situation regarding John Doe at any 8 point? 9 A. No. May 5th was when I received my COVID 10 vaccine and drove home from Butler, so I don't 11 remember that. 12 Q. Was May 5th at the end of finals or what 13 precipitated you driving home? 14 A. Yes, it was at the end of finals. May 5th was 15 the last day that RAs had to be in the building 16 to do room checks. And after I did the room 17 checks, I got my COVID vaccine and went home. 18 Q. Thank you for that information. 19 So what I'm going to do is I'm going to 20 ask you now to read the portion that says 21 "Investigator Meeting with Witness 9." And I 22 can scroll it down and, as you'll see, it 23 continues through the next page and stops 24 around page 54. So I'm going to have you read 25 from the top, and just let me know, like I</p>
<p style="text-align: right;">39</p> <p>1 foundation. 2 THE WITNESS: Do I have still have -- I 3 have to answer that? Sorry. 4 BY MS. FEDERICO: 5 Q. Yes. 6 A. Okay. No. Like I didn't have any personal 7 perception of -- I was very outside of the 8 friend group, didn't know the other people 9 personally, and also was not involved with them 10 in any other capacity as RA, so I wouldn't have 11 known any other information other than what 12 they had provided. 13 Q. I'm now going to open up the investigation 14 report once again, which the defendants have 15 labeled as Exhibit 102, and I believe for this, 16 we've labeled it as Exhibit 1. So I'm going to 17 pull that up quickly. And I've scrolled to 18 page 52 of this document, and I kind of want to 19 go through this a little with you. And I'll 20 let you read it. But do you see the part where 21 it says, "Investigator meeting with Witness 9: 22 May 5, 2021," do you see that? 23 A. Yes. 24 Q. Okay. Do you see on the first line where it 25 says, "Rother met with Witness 9 on May 5,</p>	<p style="text-align: right;">41</p> <p>1 said, exactly when you want me to scroll, and 2 we can go from there and then we can talk about 3 this a little. 4 A. Okay. You can scroll. You can scroll. You 5 can scroll. You can scroll. You can scroll. 6 Okay. 7 Q. Okay, thank you. Now, after reviewing this 8 summary of a meeting that you had with the 9 investigator, is this consistent with your 10 recollection of what occurred with the John Doe 11 situation? 12 A. You mean during the mediation? 13 Q. Yes. 14 A. Yes. 15 Q. Okay. And do you see here on page 53 of this 16 document, it says, "Witness 9 said that 17 Witness 3, Witness 2, and the complainant came 18 to speak with her after the mediation. 19 Witness 3 mentioned she did not share a lot of 20 her own experience and concern during the 21 mediation." Do you see that part? 22 A. Yes. 23 Q. What do you recall about Witness 3, Witness 2, 24 and the complainant coming to speak with you 25 after the mediation?</p>

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42	<p>1 A. Just that they came to my room. I was kind of</p> <p>2 surprised because other than the mediation, I</p> <p>3 hadn't had any interaction with them. So I</p> <p>4 thought it was strange that they would come to</p> <p>5 me, especially because Witness 3 was the only</p> <p>6 one that was my resident. So I thought that</p> <p>7 that was strange, but offered to, you know, be</p> <p>8 an ear to their concerns. And that was</p> <p>9 basically it.</p> <p>10 I remember all of them being pretty</p> <p>11 upset. Witness 2 was there more in a</p> <p>12 supporting capacity. And like as mentioned in</p> <p>13 the document, Witness 3 started to open up a</p> <p>14 bit more about her own experiences that weren't</p> <p>15 shared during the mediation itself.</p> <p>16 Q. And approximately how long did that discussion</p> <p>17 last?</p> <p>18 A. I couldn't tell you for sure. Probably less</p> <p>19 than 30 minutes.</p> <p>20 Q. Thank you. At any point did you have any</p> <p>21 concern for John Doe's general well-being?</p> <p>22 A. No.</p> <p>23 (WHEREUPON, Deposition Exhibit 3 was</p> <p>24 marked for identification.)</p> <p>25 BY MS. FEDERICO:</p>	44	<p>1 A. I know that she's the Title IX coordinator.</p> <p>2 Q. And did you ever deal with her directly?</p> <p>3 A. Not that I can recall.</p> <p>4 Q. Okay. I'm going to just scroll through this</p> <p>5 document just to see if you've ever seen it</p> <p>6 before. If you need me to go faster or slower,</p> <p>7 please let me know.</p> <p>8 A. You can continue to scroll.</p> <p>9 Q. Sure. And that's the end of the document. Do</p> <p>10 you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Do you ever recall seeing this document before?</p> <p>13 A. I recall some of the language that was present,</p> <p>14 so I'm sure I've seen it at some point.</p> <p>15 Q. Okay. And do you -- strike.</p> <p>16 Did you ever have to report anything in</p> <p>17 your capacity as a mandatory reporter in terms</p> <p>18 of sexual harassment?</p> <p>19 A. No.</p> <p>20 Q. Did you ever have to report anything in</p> <p>21 terms -- or strike.</p> <p>22 Did you ever have to report anything in</p> <p>23 your capacity as a mandatory reporter in</p> <p>24 general bullying?</p> <p>25 A. No.</p>
43	<p>1 Q. Okay. I'm going to stop sharing this screen at</p> <p>2 the current moment, and I'm going to pull up a</p> <p>3 couple other documents. I'm not sure if you've</p> <p>4 seen these before, but I'm going to ask if you</p> <p>5 have. So just bear with me a moment.</p> <p>6 Sorry, I'm having a little bit of a</p> <p>7 technical issue. I apologize for the delay.</p> <p>8 Okay. I'm now going to introduce into</p> <p>9 the record Exhibit 121, as the defendants that</p> <p>10 have identified it. And just to be clear, it</p> <p>11 is Bates labeled with the start of</p> <p>12 DEFT RESP_679.</p> <p>13 Miss Harris, I'm going to give you a</p> <p>14 moment to kind of look through this briefly,</p> <p>15 and I'm not going to be asking you too many</p> <p>16 specific questions of it. But do you recall</p> <p>17 ever seeing this training before?</p> <p>18 A. I recognize like the general, like, Butler</p> <p>19 PowerPoint presentation, but I can't remember</p> <p>20 like what -- the specific date or time frame if</p> <p>21 I'd seen this.</p> <p>22 Q. Okay. I'm going to scroll through it in just a</p> <p>23 moment, but do you know who Maria Kanger is?</p> <p>24 A. Yes.</p> <p>25 Q. What do you know about Maria Kanger?</p>	45	<p>1 Q. Did you ever have to report anything in your</p> <p>2 capacity as a mandatory reporter regarding</p> <p>3 Title IX?</p> <p>4 A. No.</p> <p>5 Q. Did you ever have to report anything in your</p> <p>6 capacity as a mandatory reporter regarding</p> <p>7 harassment?</p> <p>8 A. No.</p> <p>9 Q. Did you ever have to report anything in your</p> <p>10 capacity as a mandatory reporter with respect</p> <p>11 to stalking?</p> <p>12 A. No.</p> <p>13 Q. Okay. Give me just a moment and I can review</p> <p>14 my notes, but I think we're just about to wrap</p> <p>15 up unless Ms. Roberts has some additional</p> <p>16 questions for you.</p> <p>17 MS. FEDERICO: I have no further</p> <p>18 questions. Thank you so much, Miss Harris.</p> <p>19 THE WITNESS: Yep, no worries.</p> <p>20 MS. ROBERTS: Hi, Tarryn. My name is</p> <p>21 Libby Roberts. I represent Butler University</p> <p>22 in this lawsuit. I have just a few questions</p> <p>23 for you.</p> <p>24 CROSS-EXAMINATION,</p> <p>25 QUESTIONS BY MS. ROBERTS:</p>

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<p style="text-align: right;">46</p> <p>1 Q. I will represent to you that in the complaint 2 that was filed in this case, it indicates that 3 the mediation that was conducted was an 4 ambush-style mediation. Have you ever used 5 that term to describe the mediation? 6 A. No. 7 Q. Okay. Based upon the training that you 8 received to be an RA, do you believe the 9 mediation went according to the process that it 10 was supposed to? 11 A. Yes. 12 Q. And were both groups of individuals, meaning 13 from the people who were not your residents as 14 well as the people who were your residents, 15 were both of them allowed an opportunity to 16 speak during the mediation? 17 A. Yes. 18 Q. And at any time during the mediation, did you 19 experience anyone harassing the respondent 20 based upon his sexual orientation? 21 A. No. 22 Q. At any time during the meeting, did you witness 23 anyone who was discriminating against the 24 respondent based upon his sexual orientation? 25 MS. FEDERICO: Objection.</p>	<p style="text-align: right;">48</p> <p>1 Q. Okay. Do you ever recall sending an e-mail to 2 Shannon Mulqueen about the mediation or your 3 discussions regarding the mediation? 4 A. I don't believe that I ever sent her an e-mail 5 specifically. I do recall that Witness 10 6 filled out some sort of Google form that was 7 required for different mediations, but because 8 I wasn't the RA that was asked for the 9 mediation, I didn't have to fill out a form, 10 and I believe Witness 10 gave me the courtesy 11 of reviewing it, but I didn't have any notes 12 and so I might have been copied in whatever 13 e-mail he sent to Shannon about the mediation, 14 but I never sent an e-mail specifically, I 15 don't believe. 16 Q. And what you just described as a "form," did 17 you actually see the Google form itself or did 18 you just see a narrative? 19 A. I don't recall which one it was. I do remember 20 like making comments on it to Witness 10, 21 basically giving my okay for what was 22 presented, but I don't remember if it was the 23 form specifically or a summary of what he had 24 written. 25 Q. Okay. So if Witness 10 provided a summary, you</p>
<p style="text-align: right;">47</p> <p>1 A. No. His sexual orientation was not mentioned 2 at all during the mediation. 3 BY MS. FEDERICO: 4 Q. And you identified yourself as a mandatory 5 reporter of various things, such as bullying, 6 sexual harassment, harassment, and 7 discrimination. Did you ever witness anything 8 for which you were a mandatory reporter, but 9 yet failed to report it? 10 A. No. 11 Q. Do you still have access to your Butler e-mail? 12 A. Yes, I do. 13 Q. Do you recall if you sent an e-mail -- well, 14 let me back up. 15 Do you recall if someone made notes 16 during the mediation? 17 A. I don't recall, no. 18 Q. Do you recall -- do you know who Shannon 19 Mulqueen is? 20 MS. FEDERICO: Objection. 21 A. I know -- I know that she was one of the 22 graduate assistants for -- she was one of like 23 the supervisors. I don't know her exact title. 24 But, yes, I know who she is. 25 BY MS. ROBERTS:</p>	<p style="text-align: right;">49</p> <p>1 were able to review it and you agreed with 2 Witness 10's account, is that right? 3 A. Yes. 4 MS. ROBERTS: I don't have any other 5 questions for you, Tarryn. 6 THE WITNESS: Okay. 7 MS. FEDERICO: Awesome. Tarryn, thank 8 you so very much. I really appreciate you 9 being here. I hope you're enjoying life 10 post-graduate, and have a great rest of your 11 summer. 12 THE WITNESS: All right. Thank you. 13 MS. ROBERTS: Tarryn, we have one 14 administrative thing for you. Under the rules, 15 you have an opportunity to receive a copy of 16 the transcript that the court reporter is 17 preparing. You can review that and make sure 18 everything is accurate. If there's anything 19 that she heard wrong or didn't get something 20 down correctly, there's a sheet on which you 21 can make those changes and then you send that 22 back to the court reporter. It is completely 23 up to you as to whether or not you want the 24 opportunity to review it, or you can say you 25 waive your right to do so.</p>

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<div style="text-align: right;">50</div> <div style="margin-top: 10px;"> <p>1 THE WITNESS: No, I would like to review</p> <p>2 it, please.</p> <p>3</p> <p>4 (Deposition concluded at 3:34 p.m.)</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> </div>	<div style="text-align: right;">52</div> <div style="margin-top: 10px;"> <p>1 Page No. _____ Line No. _____</p> <p>2 Change to: _____</p> <p>3 Reason for change: _____</p> <p>4</p> <p>5 Page No. _____ Line No. _____</p> <p>6 Change to: _____</p> <p>7 Reason for change: _____</p> <p>8</p> <p>9 Page No. _____ Line No. _____</p> <p>10 Change to: _____</p> <p>11 Reason for change: _____</p> <p>12</p> <p>13 Page No. _____ Line No. _____</p> <p>14 Change to: _____</p> <p>15 Reason for change: _____</p> <p>16</p> <p>17 Page No. _____ Line No. _____</p> <p>18 Change to: _____</p> <p>19 Reason for change: _____</p> <p>20</p> <p>21 Page No. _____ Line No. _____</p> <p>22 Change to: _____</p> <p>23 Reason for change: _____</p> <p>24</p> <p>25</p> </div>
<div style="text-align: right;">51</div> <div style="margin-top: 10px;"> <p>1 DEPOSITION ERRATA SHEET</p> <p>2</p> <p>3 Page No. _____ Line No. _____</p> <p>4 Change to: _____</p> <p>5 Reason for change: _____</p> <p>6</p> <p>7 Page No. _____ Line No. _____</p> <p>8 Change to: _____</p> <p>9 Reason for change: _____</p> <p>10</p> <p>11 Page No. _____ Line No. _____</p> <p>12 Change to: _____</p> <p>13 Reason for change: _____</p> <p>14</p> <p>15 Page No. _____ Line No. _____</p> <p>16 Change to: _____</p> <p>17 Reason for change: _____</p> <p>18</p> <p>19 Page No. _____ Line No. _____</p> <p>20 Change to: _____</p> <p>21 Reason for change: _____</p> <p>22</p> <p>23 Page No. _____ Line No. _____</p> <p>24 Change to: _____</p> <p>25 Reason for change: _____</p> </div>	<div style="text-align: right;">53</div> <div style="margin-top: 10px;"> <p>1 ACKNOWLEDGMENT OF DEPONENT</p> <p>2</p> <p>3 I, TARRYN HARRIS, do</p> <p>4 hereby certify that I have read the</p> <p>5 foregoing pages, and that the same is</p> <p>6 a correct transcription of the answers</p> <p>7 given by me to the questions therein</p> <p>8 propounded, except for the corrections or</p> <p>9 changes in form or substance, if any,</p> <p>10 noted in the attached Errata Sheet.</p> <p>11</p> <p>12</p> <p>13</p> <p>14 _____</p> <p>15 TARRYN HARRIS DATE</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> </div>

14 (Pages 50 to 53)

Tarryn Harris
August 11, 2023

<p style="text-align: right;">54</p> <p>1 STATE OF INDIANA) 2) SS: 3 COUNTY OF JOHNSON) 4 5 CERTIFICATE 6 7 I, Valerie Fillenwarth, RPR, a Notary 8 Public in and for the County of Johnson, State 9 of Indiana, maintaining an office in Johnson 10 County, Indiana, do hereby certify the 11 following: 12 13 That the witness herein, TARRYN HARRIS, 14 was first duly sworn to tell the truth, the 15 whole truth and nothing but the truth in the 16 foregoing deposition; 17 18 That all testimony was taken down in 19 stenographic notes and afterward reduced to 20 typewritten form under my direction and then 21 presented to counsel for the purpose of 22 obtaining the deponent's signature; 23 24 That I recorded and transcribed any and 25 all objections made by counsel and the reasons</p>	
<p style="text-align: right;">55</p> <p>1 therefore; and 2 3 That I am not a relative or employee, 4 attorney or counsel of any of the parties, nor 5 a relative or employee of such attorney or 6 counsel, nor am I financially interested in 7 this action. 8 9 IN WITNESS HEREOF, I have hereunto set my 10 hand and affixed my Notarial Seal this 31st day 11 of August 2023. 12 13 14 15 16 Valerie Fillenwarth, RPR 17 Notary Public 18 (Electronically signed) 19 20 21 22 23 Commission Number: NP0749965 24 County of Residence: Johnson 25 My Commission Expires on: July 5, 2031</p>	

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